

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

NOTICE OF APPEAL

Part 1: Identify the appellant

Name of appellant: LLT Management LLC, formerly known as LTL Management LLC (“LTL”).²

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² On December 29, 2023, LTL Management LLC changed its name to LLT Management LLC.

Position of appellant in the bankruptcy case that is the subject of this appeal: LTL is the debtor.

Part 2: Identify the subject of this appeal

Describe the judgment, order, or decree appealed from: Under 28 U.S.C. § 158 and Federal Rules of Bankruptcy Procedure 8002 and 8003, Appellant hereby gives notice of appeal to the United States District Court for the District of New Jersey from the Bankruptcy Court's *Order Awarding Fees to Houlihan Lokey Capital, Inc.* [Dkt. 1579] (the "Fee Order"), attached as Exhibit A to the *Declaration of James N. Lawlor*, filed contemporaneously herewith (the "Counsel Declaration"), and *Order Denying Motion or Application for the Entry of an Order to Reconsider* [Dkt. 1628] (the "Reconsideration Order"), attached as Exhibit B to the Counsel Declaration.

State the date on which the judgment, order, or decree was entered: The Fee Order was entered on November 14, 2023. The court entered the Reconsideration Order on December 21, 2023.

Part 3: Identify the other parties to the appeal

The names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys are attached as Exhibit C to the Counsel Declaration.

Part 4: Optional election to have appeal heard by District Court

Not applicable in this judicial district.

Part 5: Sign Below

Dated: January 4, 2024

**WOLLMUTH MAHER & DEUTSCH
LLP**

/s/ Paul DeFilippo

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

DECLARATION OF JAMES N. LAWLOR REGARDING NOTICE OF APPEAL

I, James N. Lawlor, hereby declare under penalty of perjury:

1. I am a partner of the law firm of Wollmuth Maher & Deutsch LLP, and my office is located at 500 5th Avenue, New York, NY 10110. I am a member in good standing of the Bar of New Jersey. There are no disciplinary proceedings pending against me.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

2. I submit this declaration (the “Declaration”) in connection with the *Notice of Appeal* filed contemporaneously herewith. I have personal knowledge of the matters set forth herein.

3. Attached hereto as Exhibit A is a true and correct copy of the *Order Awarding Fees to Houlihan Lokey Capital, Inc.*, dated November 14, 2023 [Dkt. 1579].

4. Attached hereto as Exhibit B is a true and correct copy of the *Reconsideration Order Denying Motion or Application for the Entry of an Order to Reconsider*, dated December 21, 2023 [Dkt. 1628].

5. Attached hereto as Exhibit C is a true and correct list of the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: January 4, 2024

Respectfully submitted,

/s/ James N. Lawlor
James N. Lawlor

EXHIBIT A



Order Filed on November 14, 2023
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:
LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

ORDER AWARDING FEES TO HOULIHAN LOKEY CAPITAL, INC.

The relief set forth on the following pages is **ORDERED**.

DATED: November 14, 2023

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".

Honorable Michael B. Kaplan
United States Bankruptcy Judge

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

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THIS MATTER, having come before the Court on the Final Application for Compensation of Houlihan Lokey Capital, Inc., Investment Banker to the Talc Claimants Committee, and the Court having issued an opinion dated November 7, 2023 [dkt #1571] awarding fees to Houlihan Lokey Capital, Inc., and good cause appearing for the entry of the within Order,

IT IS HEREBY ORDERED AS FOLLOWS:

1. Houlihan Lokey Capital, Inc. be and is hereby awarded monthly fees in the amount of \$1,363,709.68, together with expenses in the amount of \$2,786.36.
2. Houlihan Lokey Capital, Inc. be and is hereby awarded a net discretionary fee in the amount of \$1,750,000.00.
3. The Debtor be and is hereby directed to pay the foregoing amounts to Houlihan Lokey Capital, Inc.

EXHIBIT B

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)



Order Filed on December 21, 2023
by Clerk
U.S. Bankruptcy Court
District of New Jersey

In Re:
LTL Management LLC

Case No.: 23-12825-MBK
Hearing Date: 12/21/23
Judge: Chief Judge Michael B. Kaplan
Chapter: 11

Recommended Local Form: Followed Modified

**ORDER DENYING MOTION OR
APPLICATION FOR THE ENTRY OF AN ORDER
to Reconsider (doc # 1597)**

The relief set forth on the following page is hereby **ORDERED**.

DATED: December 21, 2023

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".
Honorable Michael B. Kaplan
United States Bankruptcy Judge

A motion or application having been filed on November 28, 2023 by Paul R. DeFilippo on behalf of LTL Management LLC. for entry of an order as set forth above, all interested parties having been duly served, the Court having considered all of the papers submitted, along with any arguments of counsel, and for good cause shown; it is

ORDERED that the aforesaid motion or application is denied.

The successful party shall serve this order on the debtor, any trustee and all parties who entered an appearance on this matter.

EXHIBIT C

Party	Attorney
Movant – Houlihan Lokey Capital, Inc. Houlihan Lokey Capital, Inc. 245 Park Avenue, 20th Floor New York, NY 10167	N/A
Party in Interest – the Official Committee of Talc Claimants	<p>GENOVA BURNS LLC</p> <p>Daniel M. Stoltz, Esq. Donald W. Clarke, Esq. 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 467-2700 Facsimile: (973) 467-8126 dstoltz@genovaburns.com dclarke@genovaburns.com</p> <p>MASSEY & GAIL LLP</p> <p>Jonathan S. Massey, Esq. Bret R. Vallacher, Esq. jmassey@masseygail.com bvallacher@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467</p> <p>BROWN RUDNICK LLP</p> <p>David J. Molton, Esq. Jeffrey L. Jonas, Esq. Michael S. Winograd, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Facsimile: (212) 209-4801 dmolton@brownrudnick.com jjonas@brownrudnick.com mwinograd@brownrudnick.com</p>

	<p>-and-</p> <p>Sunni P. Beville, Esq. One Financial Center Boston, MA 02111 Telephone: (617) 856-8200 Facsimile: (617) 856-8201 sbeville@brownrudnick.com</p> <p>OTTERBOURG P.C.</p> <p>Melanie L. Cyganowski, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. Michael R. Maizel, Esq. mcyganowski@otterbourg.com asilverstein@otterbourg.com jfeeney@otterbourg.com mmaizel@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 661-9100 Fax: (212) 682-6104</p>
Party in Interest - The Office of the United States Trustee for the District of New Jersey	<p>ANDREW R. VARA UNITED STATES TRUSTEE REGIONS 3 & 9</p> <p>Jeffrey M. Sponder Lauren Bielskie United States Department of Justice Office of the United States Trustee One Newark Center, Suite 2100 Newark, NJ 07102 (cont'd)</p> <p>Linda Richenderfer Trial Attorney United States Department of Justice Office of the United States Trustee J. Caleb Boggs Federal Building 844 King Street, Suite 2207, Lockbox 35 Wilmington, DE 19801 Telephone: (302) 573-6491 linda.richenderfer@usdoj.gov</p>